

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

AARON SIEGEL;

JASON COOK;

JOSEPH DELUCA;

NICOLE CUOZZO;

TIMOTHY VARGA;

CHRISTOPHER STAMOS;

KIM HENRY; *and*

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,

*Plaintiffs,*

v.

MATTHEW PLATKIN, in his official  
capacity as Attorney General of New  
Jersey,

PATRICK J. CALLAHAN, in his  
official capacity as Superintendent of the  
New Jersey Division of State Police,

*Defendants.*

Civil Action No. 1:22-cv-07463-  
KMW-AMD

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

**DECLARATION OF AARON SIEGEL IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

1. I, Aaron Siegel, am a plaintiff in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.

2. I am a law-abiding resident and citizen of the United States and the State of New Jersey. I reside at 30 Geneva Trail, Hopatcong, New Jersey 07843. I am a member of Association of New Jersey Rifle & Pistol Clubs, Inc.

3. I am a nurse practitioner and I live with my wife and 13 year old son in Hopatcong, New Jersey.

4. I am a firearm owner and Handgun Carry Permit holder because I believe that possession and carry of firearms is an important aspect of protecting myself and my family from the risk of violent crime.

5. I obtained my Handgun Carry Permit because I recognize that violent crime can take place anywhere, including when I am outside the home.

6. I am a member of the volunteer New Jersey Medical Reserve Corps, which is a disaster response unit. I received a Certificate of Recognition and Letter of Appreciation from the Sussex County Freeholders for my volunteer service during Super Storm Sandy.

7. I previously served as an Emergency Medical Technician in Paterson, New Jersey, and as a result, I understand that emergency personnel, including police, are sometimes delayed, through no fault of their own, in their ability to timely respond to emergencies. As a result, I understand that individuals

experiencing criminal violence are often required to provide for their own personal defense against such attacks.

8. In the course of my employment, I work variously at medical offices and medical boarding homes, including, but not limited to, Skylands Urgent Care in Lake Hopatcong and Free Clinic Newton, in Newton, New Jersey, where I work as a volunteer. I also sometimes make medical visits to the homes of my patients.

9. Prior to the passage of A4769, I frequently lawfully carried my handgun in the course of my medical work as described above, and I would continue to do so, but I refrain from doing so now out of fear of arrest and prosecution.

10. I refrain because of the various prohibitions on carry in medical and medical type facilities set forth in A4769 section 7(a)(21) and (22).

11. I frequently hike and walk my dog in public parks near my home and go to publicly owned beaches, including in Wildwood, New Jersey.

12. I take my son to Tae Kwan Do classes at a martial arts school near my home and also take my son to participate in youth Tae Kwan Do competitions. The Tae Kwan Do School is located in a strip mall which also contains other stores and businesses which I frequent regularly.

13. I also frequently take my son to museums throughout New Jersey, the public library, the Turtle Back Zoo in West Orange, New Jersey and the Van Saun Zoo in Paramus, New Jersey.

14. I also take my son to bagpipe lessons.

15. Every year, I take my son deer hunting in the woods and fields of New Jersey.

16. I go to movie theatres with my family approximately one or two times per month. We also attend concerts at the Izod Center at the Meadowlands and at the PNC Banks Arts Center in Holmdel, New Jersey.

17. I sometimes attend New Jersey Devils Hockey games at the Prudential Center in Newark, New Jersey. In doing so, I sometimes take the bus or train to Newark. If I take the train, my trip terminates at Newark Penn Station.

18. I enjoy trips to the casinos in Atlantic City, New Jersey. When I do so, I enjoy gambling on the casino floors, dining in the casino restaurants, attending shows in the casino theatres, and staying in the casino hotels.

19. I enjoy dining out with my family at restaurants. Some of these restaurants have a license to serve alcohol.

20. From time to time, I drive my friends and family and drop them off and pick them up from Newark Airport.

21. I am divorced, and my son is from my first marriage. I share custody of my son with my ex-wife, and I pick my son up and drop him off at my ex-wife's condominium property. In doing so, I must drive and walk on condominium common elements.

22. From time to time, I take continuing education classes for work hosted at various places, including but not limited to hospitals, training centers, restaurants with a licenses to serve alcohol, and catering halls.

23. From time to time, I attend or pass within 100 feet of public gatherings and events, but generally do not know which ones require a government permit.

24. Anyone can encounter a place where motion picture or television images are being made while out in public, including television news coverage. I have done so multiple times in the past, and some of those times I approached the location to inquire about the production and to determine if I recognized any of the actors or personalities involved. I would again in the future approach such locations in the same manner on some occasions if I encountered them to see what film or television show was being filmed.

25. I am a private homeowner. I would allow the carry of handguns on my property, but I do not want to have to post a sign on my property explicitly saying so.

26. I drive my car nearly every day for both work and personal reasons.

27. I would carry my handgun in all of the foregoing places and would carry my handgun loaded in my car, on the bus, and on trains, but I refrain from doing so for fear of arrest and prosecution.

28. I refrain because of the prohibition on carry within 100 feet of public gatherings set forth in A4769 section 7(a)(6).

29. I refrain because of the prohibition on carry at zoos set forth in A4769 section 7(a)(9).

30. I refrain because of the prohibition on carry at parks, beaches, and recreation facilities or areas set forth in A4769 section 7(a)(10).

31. I refrain because of the prohibition on carry at youth sporting events set forth in A4769 section 7(a)(11).

32. I refrain because of the prohibition on carry in public libraries and museums set forth in A4769 section 7(a)(12).

33. I refrain because of the prohibition on carry at restaurants and other locations where alcohol is served set forth in A4769 section 7(a)(15), even though I would not consume alcohol at these locations while carrying my handgun.

34. I refrain because of the prohibition on carry at entertainment facilities set forth in A4769 section 7(a)(17).

35. I refrain because of the prohibition on carry in casinos and related facilities set forth in A4769 section 7(a)(18) and N.J.A.C. 13:69D–1.13.

36. I refrain because of the prohibition on carry at airports and public transportation hubs set forth in A4769 section 7(a)(20), even though I only drop people off and pick them up at airports and would not carry my handgun in the sterile/secure areas of any airport.

37. I refrain because of the prohibition on carry at public film and television locations set forth in A4769 section 7(a)(23).

38. I refrain because of the prohibition on carry and the possession of defensive handgun ammunition set forth in the fish and game regulations.

39. I refrain from carrying at the Tae Kwan Do school, the bagpipe classes, and my continuing education classes because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7).and N.J.S. 2C: 39-5(e) because I am unsure if those qualify as a “school, college, university or other educational institution” within the meaning of those sections because those terms are vague and those statutes do not define those terms.

40. I refrain from carrying at any of the other businesses located in the same strip mall as the Tae Kwan Do school, because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7).and N.J.S. 2C: 39-5(e) because those prohibitions include any part of the buildings, grounds, or parking area. Therefore, I fear that the prohibition on carry at “school, college, university or other educational institution” also includes all other businesses or other uses that share a parcel of property.

41. He refrains from carrying at his sons Tae Kwan Do competitions because of Section 7(a)(11).

42. I refrain from carrying my handgun loaded and on my person in my car because of the prohibition on doing so in a vehicle set forth in A4769 section 7(b)(1).

43. I also refrain from carrying my handgun loaded and on my person on a bus or train because the term “vehicle” set forth in A4769 section 7(b)(1) is vague and undefined, and I am unsure whether I may lawfully do so on a bus or train.

44. I also refrain because of the prohibition on carry on private property set forth in A4769 section 7(a)(24). Some of the foregoing places are private property, and none of owners of the private property on which I would otherwise carry has provided express consent or has posted the required sign granting permission.

45. As a result of the foregoing prohibitions, I can carry my handgun virtually nowhere outside my home.

46. I also intend to apply for additional Permits to Purchase a Handgun and therefore will be subject to the new requirements of N.J.S. 2C:58-3.

I declare under penalty of perjury that the foregoing is true and correct.

Executed within the United States.

  
\_\_\_\_\_  
Aaron Siegel

12/22/2022  
\_\_\_\_\_  
Date